

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BOB BAFFERT,)
Plaintiff)
)
v.) Case No. 1:21-cv-3329 (CBA)
)
THE NEW YORK RACING)
ASSOCIATION, INC.,)
Defendant)

**NOTICE OF MOTION TO HOLD NYRA IN CIVIL CONTEMPT AND TO STAY
NYRA'S RENEWED SUSPENSION PROCEEDINGS**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, Plaintiff, Bob Baffert (“Baffert”), will move the Court, at the United States Courthouse, 25 Cadman Plaza East, Brooklyn, New York 10021, as soon as counsel may be heard, for an order holding the Defendant, The New York Racing Association, Inc. (“NYRA”), in civil contempt for failure to comply with the terms of the Court’s July 14, 2021 Memorandum & Order enjoining it from enforcing its unlawful suspension of Baffert from New York racetracks. Additionally, Baffert seeks an Order from this Court staying NYRA’s renewed attempt to suspend him.

Dated: New York, New York
September 22, 2021

Respectfully submitted,

Charles Michael
Steptoe & Johnson LLP
1114 Avenue of the Americas
New York, New York 10036
cmichael@steptoe.com

Clark O. Brewster
BREWSTER & DEANGELIS
2617 E. 21st
Tulsa, Oklahoma 74114

/s/W. Craig Robertson, III
W. Craig Robertson III
WYATT, TARRANT & COMBS, LLP
250 West Main Street, Suite 1600
Lexington, Kentucky 40507-1746
859.233.2012
wrobertson@wyattfirm.com
(admitted *pro hac vice*)

Counsel for Plaintiff, Bob Baffert